

BOWEN LAW OFFICES
Conquistador Plaza
9960 W. Cheyenne Ave., Suite 250
Las Vegas, Nevada 89129
702-240-5191 FAX: 702-240-5797

JEROME R. BOWEN, ESQ.
Nevada Bar No. 4540
SARAH M. BANDA, ESQ.
Nevada Bar No. 11909
BOWEN LAW OFFICES
9960 W. Cheyenne Ave., Suite 250
Las Vegas, Nevada 89129
(702) 240-5191 | (702) 240-5797 facsimile
twilcox@lvlawfirm.com
ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

The Estate of MARILYN BURGARD,
Deceased, by and through KEVIN HORAN
its Special Administrator,

Plaintiff,

vs.

BANK OF AMERICA, N.A., a foreign
Corporation; AETNA LIFE INSURANCE
COMPANY, a foreign Corporation; DOES I
through X; and ROE CORPORATIONS I
through X.

Defendants.

CASE NO.: 2:15-cv-00833-RFD-GWF

**STIPULATION AND ORDER EXTENDING THE TIME TO FILE OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT REGARDING ERISA
PREEMPTION AND ELIGIBILITY FOR BENEFITS AND SUPPLEMENT
(First Request)**

The Parties have stipulated to give Plaintiff a seven (7) day extension of time to file the
Opposition to Defendants' Motion for Summary Judgment Regarding ERISA Preemption and
Eligibility for Benefits (ECF No. 47) and Supplement (ECF NO. 65) in this matter. The reasons
supporting this stipulation are as follows: Plaintiffs counsel has been in several mediations and

1 depositions.

2 The Parties request a seven day extension of time, up to and including, January 26, 2017, for
3 Plaintiff to file its Opposition. The Defendant shall have fourteen (14) days after the Omnibus
4 Opposition is filed to file a reply brief. This is the first extension of time requested by the Parties
5 related to this Motion (ECF No. 47).
6

7 IT IS STIPULATED AND AGREED by and between the parties that Plaintiff shall have up
8 to and including January 26, 2017, to file its Opposition to Defendants' Motion for Summary
9 Judgment Regarding ERISA Preemption and Eligibility for Benefits (ECF No. 47) and Supplement
10 (ECF NO. 65). The Defendant shall have fourteen (14) days after the Omnibus Opposition is filed
11 to file a reply brief
12

13 Dated this 23rd day of January, 2017.

Dated this 23rd day of January, 2017.

14
15 /s/ Jerome R. Bowen, Esq.
JEROME R. BOWEN, ESQ.
16 Nevada Bar No. 4540
SARAH M. BANDA, ESQ.
17 Nevada bar No. 11909
BOWEN LAW OFFICES
18 9960 W. Cheyenne Avenue, Suite 250
Las Vegas, Nevada 89129
19 Attorneys for Plaintiffs

20
21 /s/ Robert S. Larsen, Esq.
ROBERT S. LARSEN, ESQ.
22 Nevada Bar No. 7785
SARAH TURNER, ESQ. (pro hac vice)
23 GORDON & REES LLP
300 South Fourth Street, Suite 1550
24 Las Vegas, Nevada 89101
Attorneys for Defendants Aetna Life Insurance
25 Company and Bank of America
26
27

IT IS SO ORDERED.


28
29 RICHARD F. BOULWARE, II
United States District Court

DATED this 26th day of January, 2017.